

SUPERIOR COURT OF N.J.

FILED

MAR 19 2003

DONALD F. PHELAN
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ473-03-5(1)

Superior Court

Docket Number 03 - 03 - 00045 - S

STATE OF NEW JERSEY)

v.)

DANNIE CAMPBELL)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

DANNIE CAMPBELL

who is named as defendant herein, and George Holley, Jr., Shaheed
Johnson, Nathaniel Jones, Rashonda L. Harris, Robert P. Mitchner,
Chad Watson, Ramil Robinson, Duane Smith, Monesha Gray and
Deborah Mathis, who are coconspirators but not named as
defendants herein, between on or about July 24, 1997, and on or
about March 2, 1999, at the City of East Orange, in the County of
Essex, elsewhere, and within the jurisdiction of this Court, with
the purpose of promoting or facilitating the crimes of health
care claims fraud and theft by deception did agree that:

- A. One or more of them would engage in conduct which would
constitute the aforesaid crimes or an attempt or
solicitation to commit such crimes; or

B. One or more of them would aid in the planning, attempt, solicitation or commission of said crimes, that is:

1. Knowingly make, or cause to be made, false, fictitious, fraudulent or misleading statements of material fact in, or knowingly omit a material fact from, or cause a material fact to be omitted from, any record, bill, claim or other document, in writing, electronically or in any other form, and attempt to submit, submit, cause to be submitted or attempt to cause to be submitted said record, bill, claim or other document for payment or reimbursement for health care services in the aggregate pecuniary amount of at least \$1,000 and involving five or more acts of health care claims fraud, contrary to the provisions of N.J.S.A. 2C:21-4.3c; and
2. Purposely obtain the property of another in an amount greater than \$75,000 by deception, contrary to the provisions of N.J.S.A. 2C:20-4a.

All in violation of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Health Care Claims Fraud - Second Degree)

• DANNIE CAMPBELL

being a person who is not a practitioner, between on or about January 15, 1998, and on or about March 2, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely and knowingly did commit five or more acts of health care claims fraud and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000, in that the said DANNIE CAMPBELL purposely and knowingly did make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact in, or purposely and knowingly did omit material facts from, or purposely and knowingly did cause material facts to be omitted from, any records, bills, claims or other documents, in writing, electronically or in any other form, that a person attempted to submit, submitted, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services; that is, the said DANNIE CAMPBELL purposely and knowingly did commit five or more acts of health care claims fraud and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000, in that the said DANNIE CAMPBELL purposely and knowingly did make, or cause to be made, false, fictitious, fraudulent, or misleading statements of material fact

in patient records, bills, claims or other documents, in writing, electronically or in any other form, that a person attempted to submit, submitted, caused to be submitted, or attempted to cause to be submitted for payment or reimbursement for health care services to Keystone Insurance Company/AAA Mid-Atlantic Insurance Company of New Jersey; said false, fictitious, fraudulent, or misleading statements of material fact relating to health care claims having an aggregate pecuniary benefit of at least \$1,000, and purporting that injuries were sustained by George Holley, Jr., Shaheed Johnson, Nathaniel Jones and Rashonda L. Harris in an automobile accident that allegedly occurred on July 24, 1997, in the Township of Hillside, County of Union, and purporting that injuries were sustained by Ramil Robinson, Duane Smith, Monesha Gray and Deborah Mathis in an automobile accident that allegedly occurred on September 16, 1998, in the City of Newark, County of Essex, when the accidents were wholly fictitious and did not occur and the injuries complained of had not been sustained, contrary to the provisions of N.J.S.A. 2C:21-4.2, N.J.S.A. 2C:21-4.3c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

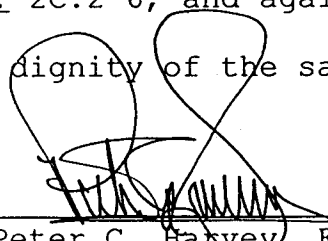
(Attempted Theft By Deception - Second Degree)

DANNIE CAMPBELL

between on or about July 24, 1997, and on or about March 2, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did attempt to obtain by deception the property of another in an amount in excess of \$75,000; that is, the said DANNIE CAMPBELL purposely did attempt to obtain the property of Keystone Insurance Company/AAA Mid-Atlantic Insurance Company of New Jersey in excess of \$75,000 by creating or reinforcing the false impression that a motor vehicle accident occurred on July 24, 1997, in the Township of Hillside, County of Union, in which George Holley, Jr., Shaheed Johnson, Nathaniel Jones and Rashonda L. Harris sustained injuries requiring health care services, and that a motor vehicle accident occurred on September 16, 1998, in the City of Newark, County of Essex, in which Ramil Robinson, Duane Smith, Monesha Gray and Deborah Mathis sustained injuries requiring health care services, and that health care services provided for those injuries were compensable pursuant to the Personal Injury Protection (PIP) coverage contained in the automobile insurance policies of George Holley, Jr. and Chad Watson;

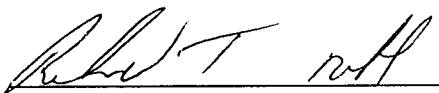
WHEREAS, IN TRUTH AND IN FACT, as the said DANNIE CAMPBELL

well knew, the said motor vehicle accidents were wholly fictitious and did not occur and the injuries complained of had not been sustained, and that any health care services thus provided were not compensable pursuant to the Personal Injury Protection (PIP) coverage contained in the automobile insurance policies aforesaid, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Peter C. Harvey, F.A.A.G.
Director
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 3-19-03.